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21 UNITED STATES DISTRICT COURT

22 DISTRICT OF NEVADA

23  
24 CASE NO.: 2:24-cv-02181  
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EDDIE FRIERSON, an individual;  
 ALBERTO CARDOSO-RAMIREZ, an  
 individual; ANA FIGUEROA-CUEVA, an  
 individual; DEANNA DANIELS, an  
 individual; JANELLE JOHNSON, an  
 individual; JOSEPH JOHNSON, an  
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 TOLOSA, an individual; MICHAEL  
 MARTINEZ, an individual; STACY  
 MARTINEZ, an individual; SADIE JOSEIF,  
 an individual; KEVIN JOSEIF, an individual;  
 TRAVIS SCARBROUGH, an individual;  
 MARIELA ESTRADA, an  
 individual; KWANTIDA PAYAKKA, an  
 individual; JOEL MARTINEZ GUERRA, an  
 individual; ROCIO MEDINA SOLARTE, an  
 individual; TONI O'NEILL, an individual;  
 and, ARTURO CASTANARES, an  
 individual;  
 Plaintiffs,  
 v.  
 FRONTIER AIRLINES, INC., a Colorado  
 Corporation; Doe Individuals 1-XX,  
 inclusive; and ROE Entities 1-XX;  
 Defendants.

**JOINT STATUS REPORT  
 (SPECIAL SCHEDULING REVIEW  
 REQUESTED)**

COME NOW, Plaintiffs Eddie Frierson, Alberto Cardoso-Ramirez, Ana Figueroa-Cueva, Deanna Daniels, Janelle Johnson, Joseph Johnson, Jayden Eggleston, Melisa Gutierrez-Tolosa, Michael Martinez, Stacy Martinez, Sadie Joseif, Kevin Joseif, Travis Scarbrough, Mariela Estrada, Kwantida Payakka, Joel Martinez Guerra, Rocio Medina Solarte, Toni O'Neill and Arturo Castanares (collectively "Plaintiffs"), by and through their counsel, STEVE DIMOPOLOUS, ESQ., JARED B. KAHN, ESQ., and SCOTT R. COOK of DIMOPOULOS LAW FIRM, and Defendant, Frontier Airlines, Inc. ("Frontier"), by and through its counsel of record, CHARLES MICHALEK of Rogers, Mastrangelo, Carvalho & Mitchell and BRIAN MAYE of Fitzpatrick, Hunt & Pagano, LLP, and hereby submit this INITIAL JOINT CASE STATUS REPORT under Rule 26(f) and per the Minute Order of the Court dated November 22, 2024 (Document 4):

1 PLAINTIFFS' NATURE OF THE CASE

2 This matter arises from an emergency crash landing of Frontier Airlines Flight 1326 at Harry  
3 Reid Airport in Las Vegas, Nevada, on October 5, 2024, and claims of permanent and disabling injuries  
4 incurred by Plaintiff passengers on the flight.

5 DEFENDANT'S NATURE OF THE CASE

6 This matter arises from the landing of Frontier Airlines Flight 1326 at Harry Reid Airport in Las  
7 Vegas, Nevada, on October 5, 2024, which resulted in the tires of the aircraft to overheat and catch fire.  
8 Plaintiffs, who were passengers on the flight, are claiming that they sustained injuries related to the  
9 incident.

10 HISTORY OF THE CASE

- 11 1. Plaintiffs filed their Complaint on October 21, 2024.
- 12 2. Frontier was served on November 5, 2023.
- 13 3. On November 21, 2024, Frontier removed this action from the Eighth Judicial District  
14 Court, Clark County, Nevada to the United States District Court for the District of  
15 Nevada.
- 16 4. Plaintiffs filed their First Amended Complaint on November 22, 2024.
- 17 5. Frontier filed its Answer in the federal court action on December 6, 2024.
- 18 6. Frontier filed its Statement Regarding Removal on December 6, 2024
- 19 6. The parties held their FRCP 26(f) conference on December 18, 2024.
- 20 7. Plaintiffs have advised they will file a Second Amended Complaint and add additional  
21 plaintiffs to this action.
- 22 8. There are no pending motions or other matters which require the attention of the Court  
23 at this time.

24 PLAINITFFS' KEY ISSUES/CONCERNS

25 Plaintiffs anticipate the development of the case and discovery will involve liability and the  
26 extent of damages raised and claims and defenses related to the same. It is anticipated that there will  
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1 be extensive discovery practice and multiple experts engaged. No issues are scheduled pending the  
2 filing of a Scheduling Order.

3 DEFENDANT'S KEY ISSUES/CONCERNS

4 The parties anticipate discovery to focus on determining the cause of the tires overheating  
5 and catching fire, and to what extent Plaintiffs may have sustained injuries related to the incident.

6 ELECTRONIC DISCOVERY AND PRESERVATION

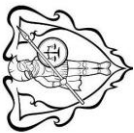
7 The parties have agreed to mutually preserve electronically stored information that may be  
8 discoverable under Rule 26(b).

9 CONFIDENTIALITY

10 The parties intend to file a joint motion for a protective order regarding confidentiality.

11 DISCOVERY

- 12
- 13 • The parties anticipate a discovery period 18 to 24 months due to the number of
  - 14 parties, anticipated medical providers, and expert discovery regarding liability and
  - 15 damages. The parties have further agreed to work with each other to establish
  - 16 reasonable discovery periods and cooperate with each other to complete the same.
  - 17 Specific dates have not been discussed pending a Scheduling Hearing regarding the
  - 18 same but the parties suggest the following:
- 19 • Initial Disclosures: January 17, 2025
  - 20 • Motion to Amend Pleadings or Add Parties: March 27, 2026
  - 21 • Close of Fact Discovery: May 21, 2026
  - 22 • Plaintiffs' Disclosure of Experts: June 18, 2026
  - 23 • Defendant's Disclosure of Experts: July 23, 2026
  - 24 • Plaintiffs' Rebuttal Experts: August 20, 2026
  - 25 • Dispositive Motions: September 24, 2026
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ALTERNATIVE DISPUTE RESOLUTION

The parties agree it is premature to discuss Alternative Dispute Resolution pending discovery but have agreed to participate in Alternative Dispute Resolution with a third party neutral and use good faith efforts to resolve the matter prior to trial.

DATED this 24<sup>th</sup> day of December 2024.

DATED this 24<sup>th</sup> day of December 2024.

DIMOPOULOUS LAW FIRM

ROGERS, MASTRANGELO, CARVALHO &  
MITCHELL

*/s/ Scott R. Cook*

*/s/ Brian T. Maye*

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